

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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FEDERAL BUREAU OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE

Postal Rate and Fee Changes, 2001

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Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE  
MOTION TO REQUEST THAT THE PRESIDING OFFICER  
ACCEPT FOR FILING A REPORT ON QUALITY OF SERVICES  
PROVIDED BY THE POSTAL SERVICE TO THE PUBLIC  
(March 6, 2002)

Pursuant to Rule 21 of the Rules of Practice of the Postal Rate Commission,<sup>1</sup> the Office of the Consumer Advocate (OCA) hereby requests that the Presiding Officer accept for filing a report prepared by OCA on the Quality of Services Provided by the Postal Service to the Public, together with four supporting library references, i.e., OCA-LR-J-2, -3, -4, and -5.

OCA explains in the initial section of the report that it has made a determined effort in the instant rate case to obtain information on the quality of services that the Postal Service provides to the public. It has been the objective of the OCA throughout the proceeding to adduce information that covers a broad range of services used by the public (primarily individual and small business mailers) and investigate these matters as thoroughly as time and discovery would permit. At the outset, the purpose of developing and obtaining such information was threefold: (1) to see whether the Postal Service's proposed cost coverage levels appropriately reflected the quality of service associated with particular classes and services, (2) to perform an independent assessment of the contingency based upon OCA's analysis of whether the need for a

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<sup>1</sup> 39 C.F.R. §3001.21

particular level of contingency was truly “unforeseen” and “beyond the control” of the Postal Service, and (3) to bring to the attention of the Commission below-par provision of services widely used by the public and upon which, in many cases, the public is highly dependent.

After becoming a signatory of the Stipulation and Agreement in late December 2001, OCA abandoned any plans to challenge either the specific rates for services used by the public or to challenge Postal Service testimony on the contingency. OCA states emphatically that the report filed this date represents no challenge to the rates and classifications contained within the Stipulation and Agreement. OCA supports the Stipulation and Agreement without any reservations, exceptions or conditions, as expressed in OCA’s Initial Brief, filed March 4, 2002. The third goal of the OCA, however, to focus attention on unacceptable service quality, remains.<sup>2</sup>

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<sup>2</sup> The third goal – to draw attention to inadequate quality in the provision of services – is consistent with the mission statement of the OCA adopted by the Commission on July 12, 1999. It is the overarching mission of OCA “to be a vigorous, responsive, and effective advocate for reasonable and equitable treatment of the general public in proceedings before the [ ] Commission.” 39 C.F.R., Part 3002, Appendix A. In carrying out this mission, OCA must “[g]ive a strong and consistent voice to the views of consumers” and “[a]rgue for equity on behalf of individuals and small businesses, both as senders and as recipients of mail and mail services.”

During the past year, OCA had the opportunity to meet with a representative of the Consumer Council of Postal Services, an organization established by the United Kingdom’s Postal Services Act 2000, Chapter 26, Part I, section 2. See <http://www.legislation.hmso.gov.uk/acts/acts2000/00026--b.htm>. The Consumer Council took on the role of “consumer watchdog for postal services” and adopted the name “Postwatch.” Postwatch is independent of any control by the government of the U.K. and is independent of the Post Office, as well. See <http://www.postwatch.co.uk/whatwedotext.html>. One of Postwatch’s chief aims is to obtain the best possible service from post offices for customers. *Id.* The main constituency of Postwatch is consumers in businesses and homes. *Id.* Working closely with the U.K.’s regulator, Postcomm, Postwatch sets service standards for, e.g., delivery, queuing times in post offices, and compensation for lost and damaged mail. *Id.* Once having established these standards, Postwatch ensures that the Post Office meets the targets set for it. If the Post Office fails to meet established standards, it can be required, by Postcomm (as influenced by Postwatch) to make restitution to customers and to pay financial penalties. *Id.* Furthermore, if the Post Office does not resolve customer complaints satisfactorily, Postwatch may intervene on behalf of the complainant. *Id.*

With the support of the Postal Rate Commission, OCA has expanded its role and assumed some of the responsibilities that are performed by organizations such as Postwatch. OCA will strive to protect consumer (i.e., individual and small business) interests with respect to service, as well as rate and classification, issues.

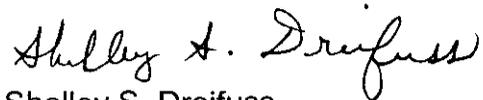
It is the hope of the OCA that, by drawing attention to problems faced by the public in benefiting from postal services that have been purchased, these services may be improved. The report filed today is not intended to be adversarial in nature. When the Postal Service offers high quality services to the public, everyone wins – the public does by receiving services that reflect the value of what has been paid and the Postal Service does, as well, by sustaining high Brand Equity and high Customer Equity.<sup>3</sup> This may, in turn, ensure a high, dependable revenue stream that could lead to a reduced need for a contingency.

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<sup>3</sup> This is discussed at length in the last section of the report.

Wherefore, for the reasons set forth above, OCA respectfully requests that the Presiding Officer accept the filed Report on the Quality of Services Provided by the Postal Service to the Public, along with the four supporting library references: OCA-LR-J-2, -3, -4, and -5.

Respectfully submitted,

  
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#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

  
h'Enri Whitseyjohnson

Washington, D.C. 20268-0001  
March 6, 2002